

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GIRAFA.COM, INC.,

Plaintiff,

v.

AMAZON WEB SERVICES, LLC,
AMAZON.COM, INC.,
ALEXA INTERNET, INC.,
IAC SEARCH & MEDIA, INC.,
SNAP TECHNOLOGIES INC.,
YAHOO! INC.,
SMARTDEVIL INC.,
EXALEAD INC., AND
EXALEAD SA.,

Defendants.

C.A. No. 07-787-SLR

**PLAINTIFF’S REPLY TO COUNTERCLAIMS OF
DEFENDANTS EXALEAD INC. AND EXALEAD SA.**

Plaintiff and Counterclaim Defendant Girafa.Com, Inc. (“Girafa”) hereby replies to Exalead S.A. and Exalead, Inc.’s (collectively referred to herein as “Exalead”) Answer to Girafa.Com, Inc.’s Complaint for Patent Infringement, Affirmative Defenses, and Counterclaims, as follows:

PARTIES

- 50. Girafa admits the allegations in paragraph 50 of Exalead’s Counterclaims.
- 51. Girafa admits the allegations in paragraph 51 of Exalead’s Counterclaims.
- 52. Girafa admits the allegations in paragraph 52 of Exalead’s Counterclaims.

JURISDICTION AND VENUE

- 53. Girafa admits the allegations in paragraph 53 of Exalead’s Counterclaims.

54. Girafa admits the allegations in paragraph 54 of Exalead's Counterclaims.

COUNTERCLAIMS

55. Girafa admits that it has alleged that Exalead infringes the '904 patent and that an actual and justiciable controversy exists between Girafa and Exalead, but denies the remaining assertions in paragraph 55 of Exalead's Counterclaims.

FIRST COUNTERCLAIM
(Declaration of Noninfringement)

56. Girafa restates and incorporates by reference its responses to paragraphs 50-55 of Exalead's Counterclaims as if fully set forth herein.

57. Girafa denies the allegations in paragraph 57 of Exalead's Counterclaims.

SECOND COUNTERCLAIM
(Declaration of Invalidity)

58. Girafa restates and incorporates by reference its responses to paragraphs 50-57 of Exalead's Counterclaims as if fully set forth herein.

59. Girafa denies the allegations in paragraph 59 of Exalead's Counterclaims.

RELIEF REQUESTED

Girafa denies that Exalead is entitled to any aspect of the relief it seeks.

ADDITIONAL PRAYER FOR RELIEF

WHEREFORE, in addition to its Complaint and in response to Exalead's Counterclaims, Girafa respectfully requests that:

a. Judgment be entered declaring that each of the claims of the '904 patent is valid, enforceable and infringed;

b. Judgment be entered that each of the counterclaims against Girafa is dismissed with prejudice;

c. Judgment be entered awarding Girafa its costs and reasonable attorneys' fees pursuant to 35 U.S.C. § 285; and

d. The Court enter such other and further relief as the Court may deem just and proper under the circumstances.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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Dated: February 22, 2008
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